

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOBBY GIRIFALCO,	:	CASE NO. 2:25-cv-02955-WB
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
DISCOUNT POWER, INC.,	:	
	:	
Defendant.	:	

**DEFENDANT DISCOUNT POWER, INC.’S
CONSENT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

AND NOW comes Defendant DISCOUNT POWER, INC. (“Defendant”) by and through its counsel, Gordon Rees Scully Mansukhani, LLP, and pursuant to Federal Rule of Civil Procedure 6(b), files the within Motion to Extend Time to Respond to Complaint, respectfully averring as follows:

1. Defendant was served with the Complaint in this matter on June 12, 2025.
2. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant’s response to the Complaint is due on July 3, 2025.
3. Defendant recently retained the law firm of Gordon Rees Scully Mansukhani, LLP to represent its interests in this matter.
4. Counsel for the Defendant requires additional time to investigate the allegations of the Complaint, to confer with its client to gather and organize background information regarding the case, and to prepare a responsive pleading, motion, and/or request.
5. No prejudice will result from the extension of time sought herein, and no rights of Plaintiff will be diminished as a result of this brief extension. In fact, counsel for the parties are discussing potential resolution of this action.

6. Further, Defendant's counsel conferred with Plaintiff's counsel, and Plaintiff's counsel consents to the requested extension.

WHEREFORE, Defendant respectfully requests that this Court enter the attached proposed Order granting Defendant's motion for a fourteen (14) day extension of time and providing Defendant until July 17, 2025 to respond to the Complaint.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

Dated: July 7, 2025

By: /s/ Jessica G. Lucas
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Consent Motion to Extend Time to Respond to Complaint has been served on this 7th day of July, 2025 upon all counsel and parties of record via the Court's Electronic Filing System.

By: /s/ Jessica G. Lucas
Jessica G. Lucas